

COMMONWEALTH OF MASSACHUSETTS

BARNSTABLE, SS.

SUPERIOR COURT

---

JESSE E. TORRES III )  
 JENNIFER J. ADAMS )  
 Plaintiffs )  
 vs. )  
 SOPHIE J. TORRES )  
 JESSE E. TORRES IV )  
 DEBTMERICA, LLC. )  
 DONALD F. TORRES )  
 Defendants )

---

Civil Docket # BACV2011-00433

**VERIFIED MOTION TO CONSOLIDATE:  
NOTICE TO QUIT AND NOTICE OF NO TRESPASS, AND ISSUE A PROTECTIVE ORDER**

The Plaintiffs move this Court to consolidate the actions filed by the Defendant Sophie J. Torres through her Attorney Jeremy M. Carter; Notice of Trespass and Notice to Quit, which were served on the Plaintiffs this day of August 5, 2011, and further to issue a protective order enjoining said Defendant from filing actions in other jurisdictions that are now before this Court.

In support of this motion, the Plaintiffs reallege and reassert paragraphs 1 through 134 of their Complaint, which are incorporated herein by reference and further that:

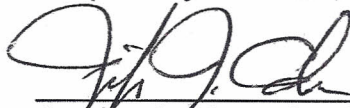
1. The two notices received by the Plaintiffs were inartfully formed and contradictory, as the Notice to Quit states that the Plaintiffs vacate the property of 562 Waquoit Highway, East Falmouth, MA 02536 (Property) in ninety (90) days, see exhibit "BB" hereto attached, and the Notice of Trespass, see exhibit "AA" hereto attached, states that the Plaintiffs may not enter their home or office located on the Property effective immediately.
2. The Notice of Trespass specifically states that the Plaintiffs will be charged with criminal trespass at the Falmouth District Court, and yet when the Plaintiffs this day on or about 12:30 PM, called the Falmouth District Court to obtain a case number, there was none, nor did any of the notices served on the Plaintiffs contain one.
3. This Court now has before it the Plaintiffs' Motion for Status Quo, Verified Motion for Mental Exam and Motion to Restrain Certain Parties from Discussing the Case or Plaintiffs with the Defendant Sophie J. Torres.
4. In an attempt to side-step this Court's authority and its hard earned knowledge of the complexities of this action, the Defendant now attempts to circumvent a hearing of these matters before the proper Court of jurisdiction.

5. The Plaintiffs assert that these actions by the Defendant Sophie J. Torres and her attorney are pure and simple attempts at harassing the Plaintiffs.
6. The Plaintiffs have at all times respected the Defendant Sophie J. Torres and her privacy.
7. The Plaintiffs argue that part of the motivation for filing these Notices were the result of Mr. Carter sending a threatening email to the Plaintiffs for serving pleadings and Notices directly to the Defendant Sophie J. Torres, See Exhibit "CC" hereto attached. When the Plaintiffs pointed out to Mr. Carter that it was he who violated Massachusetts Civil Rule 5 (a) creating a Conditions Precedent whereby the Plaintiffs could not deliver papers to him, as they did not know who he was, nor his address, see Plaintiffs' "*Verified Memorandum Requesting the Attention of the Court for Violations of Obligation of Candor by Defendants' Attorneys*", see exhibit "DD" hereto attached and said Memorandums exhibits "V" through "Y".

**WHEREFORE** the Plaintiffs pray that this Court issue these orders:

1. to consolidate these actions and place them before this Court, and
2. issue a Protective Order prohibiting the Defendant from filing actions in other Courts that are now before, or should be before this Court, and
3. issue a Protective Order prohibiting the Falmouth Police Department or any other Law Enforcement Organization from taking any actions against the Plaintiffs until these matters are heard by this Court, and
4. [that] the Defendant be enjoined from filing any such actions, with any other Court or Law Enforcement Organization that are part of this action, and before this Honorable Court, and
5. any other rulings as this Court deems just and proper.

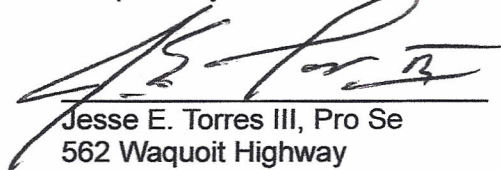
Respectfully submitted,



---

Jennifer J. Adams, Pro Se  
562 Waquoit Highway  
East Falmouth, MA 02536  
(617) 840-7880  
[jadams@ietiii.com](mailto:jadams@ietiii.com)

Respectfully submitted,



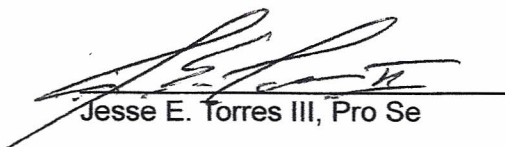
---

Jesse E. Torres III, Pro Se  
562 Waquoit Highway  
East Falmouth, MA 02536  
(617) 291-0862  
[jtorres@ietiii.com](mailto:jtorres@ietiii.com)

Dated August 05, 2011

**CERTIFICATE OF SERVICE**

I, Jesse E. Torres III, hereby certify that on August 05, 2011, I have served the Defendants Sophie J. Torres, Jesse E. Torres IV and Debtmerica, LLC, through their attorneys of record, a true copy of this document by postage prepaid U.S. Mail.

  
Jesse E. Torres III, Pro Se

**VERIFICATION ATTESTATIONS**

**Plaintiff Jesse E. Torres III:**

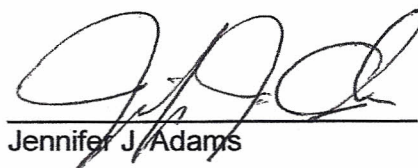
I Jesse E. Torres III of Barnstable County, Massachusetts did personally prepare this motion and I do herein swear, under the pains and penalties of perjury, that the facts contained herein, are true to the best of my personal knowledge.

  
Jesse E. Torres III

August 5, 2011  
Date

**Plaintiff Jennifer J. Adams:**

I Jennifer J. Adams of Barnstable County, Massachusetts did review this motion and I do herein swear, under the pains and penalties of perjury, that the facts contained herein, are true to the best of my personal knowledge.

  
Jennifer J. Adams

August 05, 2011  
Date